

LOVELL STEWART HALEBIAN JACOBSON LLP

61 Broadway, Suite 501
New York, New York 10006
www.lshllp.com

Telephone
212.608.1900

Facsimile
212.719.4775

November 1, 2013

VIA ECF

Honorable John Gleeson
United States Courthouse
225 Cadman Plaza East, Room 727S
Brooklyn, New York 11201

Re: *Precision Associates, Inc., et al. v. Panalpina World Transport (Holding) Ltd. Et al.*; No. 08-cv-0042 (JG)(VVP)

Dear Judge Gleeson,

Plaintiffs write this letter in order to request an extension from November 7 until November 18 in Plaintiffs' time to respond to the numerous objections by Defendants to Magistrate Judge Pohorelsky's Report and Recommendation of September 20, 2013 (ECF No. 878). These objections are filed as ECF Nos. 905, 906, 907, 908, 909, 910, 911, 912, 913, and 915.

As reasons therefor, Plaintiffs respectfully state as follows. Defendants consent to this application. The issues to be briefed are extensive. Plaintiffs previously agreed to a 16-day extension in Defendants' time to submit their objections. No prior request by Plaintiffs for an extension has been made. Plaintiffs have been engaged in extensive negotiations and work with the Defendants relating to disclosure and discovery matters; the conference to address all such issues is also to be held on November 7, before Magistrate Judge Pohorelsky.

Thank you very much.

Respectfully Submitted,

/s/Christopher Lovell

Christopher Lovell
LOVELL STEWART HALEBIAN

Letter To The Honorable John Gleeson
United States District Court
Eastern District of New York
September 20, 2012
Page 2

JACOBSON LLP
61 Broadway, Suite 501
New York, NY 10006
Telephone: (212) 608-1900
Facsimile: (212) 719-4775
Email: clovell@lshllp.com

W. Joseph Bruckner
LOCKRIDGE GRINDAL NAUEN
P.L.L.P.
100 Washington Avenue South, Suite
2200
Minneapolis, MN 55401
Telephone: (612) 339-6900
Facsimile: (612) 339-0981
Email: wjbruckner@locklaw.com

Steven N. Williams
COTCHETT, PITRE & McCARTHY,
LLP
One Liberty Plaza, 23rd Floor
New York, NY 10006
Telephone: (212) 682-3198
Facsimile: (646) 219-6678
Email: swilliams@cpmlegal.com

Daniel E. Gustafson
GUSTAFSON GLUEK PLLC
120 South Sixth Street, Suite
2600 Minneapolis, MN 55402
Telephone: (612) 333-8844
Facsimile: (612) 339-6622
Email: dgustafson@gustafsongluek.com

Interim Co-Lead Counsel for Plaintiffs

cc: All Counsel of Record (via ECF)